

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

<i>In re:</i>	§	BANKRUPTCY CASE NO. 22-32311-H5-13
	§	
DYNELL SHANEEN THOMAS	§	
DEBTOR	§	
	§	
BRIXTON MASON TIC, LLC	§	
DBA MASON PARK	§	
MOVANT	§	
	§	
V.	§	
	§	
DYNELL SHANEEN THOMAS	§	
WILLIAM E. HEITKAMP, TRUSTEE	§	CHAPTER 13

**ANSWER TO MOTION FOR RELIEF FROM STAY FILED BY CREDITOR
BRIXTON MASON TIC, LLC, DBA MASON PARK (DOCKET #36)**

COMES NOW, Dynell Shaneen Thomas, Debtor in this case, and files this response to the Motion for Relief From Stay filed by Creditor Brixton Mason TIC, LLC dba Mason Park. Debtor would respectfully show the Court the following:

1. Paragraph 1 contains no allegations to admit or deny.
2. The allegations in paragraph 2, 3, 4, 5 and 6 are admitted.
3. The allegations in paragraphs 7 are denied or denied as written.
4. Paragraphs 12 and 13 contain no allegations to admit or deny.
5. The parties have discussed an agreed order. However, as of the time of the filing of this response, the terms of the agreement have not been reduced to writing.
6. Counsel for Debtor anticipates submission of a proposed agreed order prior to the scheduled hearing on this motion.

Wherefore, Debtor prays that the Court, at the preliminary or later hearing, deny all relief requested in Creditor's Motion for Relief From Stay and that the Court grant all relief to which Debtor is entitled, at law or in equity, including reasonable attorney's fees.

Respectfully submitted,

/s/ Corey L. Mills

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Attorney for Debtor

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Debtor's Answer to Motion for Relief From Stay was served on the below listed parties by electronic transmission and/or United States First Class Mail, postage prepaid, on this the 9th day of December, 2022.

<u>Debtor:</u> Dynell Shaneen Thomas 222 Mason Creek Drive, Apt. 716 Katy, TX 77450	<u>Chapter 13 Trustee:</u> William E. Heitkamp 9821 Katy Freeway, Suite 590 Houston, Texas 77024
<u>United States Trustee:</u> Office of the U.S. Trustee 1000 Louisiana, Suite 2300 Houston, TX 77002	<u>Creditor:</u> Brixton Mason TIC, LLC dba Mason Park c/o Brandy Alexander 2502 La Branch St. Houston, TX 77004 Email: brandyalexander@alexanderpllc.com

All other persons and entities on attached sheet(s), if any.

Respectfully submitted,

/s/ Corey L. Mills

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